CORRES. CONTROL OUTGOING LTR NO.

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## EGEG ROCKY FLATS

EG&G ROCKY FLATS, INC.

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PARTIAL/OPEN
CLOSED
TR APPROVALS:

October 13, 1994

94-RF-10314

F. R. Lockhart

Director

Environmental Restoration Major Systems Acquisition

DOE, RFFO

ACCELERATED SLUDGE REMOVAL PROJECT (ASRP) AND LETTER OF SEPTEMBER 26, 1994 ER:FRL:10197 - SRK-210-94

Action: None required

EG&G appreciates being notified of the Department of Energy's (DOE) position regarding the January 20, 1995 Interagency Agreement (IAG) milestone to empty the Solar Ponds of sludge and water. However, we strongly disagree with the implication that project delays are attributable to negligent management.

In reviewing ASRP history, there are numerous delays which have been created by activities or circumstances beyond the control of EG&G. For example:

- Permitting delays impacting both Pond 207 B and Pond 207 C material movement. This includes the time spent, with Rocky Flats Field Office (RFFO) concurrence, successfully contesting the conditional approvals from Colorado Department of Public Health and Environment (CDPHE) on storage of Pond 207 C material on the 750 Pad. This success avoided potential cost impacts to the project.
- Unforeseeable equipment problems, such as the broken axle on the "saltbuster" and bearing failure on the blower of one vacuum truck.
- The difficulty in unloading Pond 207 C material from the vacuum trucks.
- Health and Safety Plan (HASP) delays brought about by comments from RFFO, which does not normally participate in HASP reviews or approvals.
- Plantwide restructuring due to changes in the DOE mission and redirected plant priorities and budgets has impacted the specific workforce on ASRP, causing personnel changes and retraining efforts.

Nevertheless, EG&G has replanned the project execution during the recent standdown and intends to make every effort possible to meet the IAG commitment. Some of the initiatives being taken are

- —revised truck unloading methodology utilizing a water flush
- —additional equipment for both operational and backup purposes
- -special training classes to qualify additional staff
- -expedited clearance reinstatement for recalled Radiological Control Technician
- —Creation of a detailed day by day schedule and a daily action center meeting.

ADMIN RECORD IA-A-000374



F. R. Lockhart 94-RF-0314 October 13, 1994 Page 2

EG&G appreciates the support given by the DOE Solar Pond Projects office staff in this effort. In view of the delays and difficulties in handling C Pond material, EG&G recommends that DOE send the attached letter to the regulators giving them project status. As you know, the regulators appreciate being kept informed of potential problems and delays rather than being surprised at the last minute.

Please call me if you wish to discuss further.

S. R. Keith

Program Manager Solar Pond Projects EG&G Rocky Flats, Inc.

Attachment As Stated

Orig. and 1 cc - F. R. Lockhart

S. Howard

DOE, RFFO

M.A. Witherill

DOE, RFFO

Attachment 1 94-RF-10314 Page 1 of 2

94-DOE-XXXXX

Mr. Martin Hestmark U. S. Environmental Protection Agency, Region VIII ATTN: Rocky Flats Project Manager, 8HWM-RI 999 18th Street, Suite 500, 8WM-C Denver, Colorado 80202-2405

Mr. Gary Baughman Hazardous Waste Facilities Unit Leader Colorado Department of Public Health and Environment 4300 Cherry Creek Drive South Denver, Colorado 80222-1530

## Gentlemen:

This is a brief status report of the progress in meeting the January 20, 1995 Interagency Agreement (IAG) milestone to render the Solar Ponds "clean and dry."

Ponds 207 A, 207 B center, and 207 B south have been emptied of all sludge and water, except for incidental precipitation which will be periodically pumped out. Pond 207 B north has a small amount of water and sludge as it was used as a staging area for rinse down water in the Pond 207 B south cleanout. Pond 207 B north should be "clean and dry" very soon, except of course for incidental precipitation.

Pond 207 C is in the process of being emptied. We expected to have this effort complete by now, but have been delayed by numerous unexpected difficulties, some of which were beyond our control. Delays have been caused by resolution of permitting issues raised by the Colorado Department of Health and Environment (CDPHE) on both Pond 207 B and 207 C, unexpected equipment problems, health and safety concerns, and most troublesome, difficulties in the material handling of the sludge/salt material. The material is vacuumed into the trucks without problem but unloading the trucks has been difficult. The material behaves much like beach sand in that liquid immediately drains out of it, leaving a "heel" built up in the trucks, in spite of tilting the truck tank (as a dump truck). This has caused plugged discharge lines and some minor spills.

The following steps are being aggressively implemented to meet the IAG milestone:

- Revised truck unloading methodology utilizing a water flush
- Additional equipment for both operational and backup purposes
- Special training classes to qualify additional staff
- Expedited clearance reinstatement for recalled Radiological Control Technician (RCT)
- Creation of a detailed day by day schedule and a daily action center meeting

Attachment 1 94-RF-10314 Page 2 of 2

The DOE is making every effort to meet and beat our committed milestone and will keep you informed of our progress. Please give me a call if you wish to discuss this further.

Sincerely,

F. R. Lockhart
Director, Environmental Restoration
Major Systems Aquisition